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NOV 2 - 1989

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

Federal Communications Commission  
Office of the Secretary

In the Matter of	)	
	)	DA 89-1060
A.C. Nielsen Company	)	
Request to Use Line 22	)	
For Its Automated	)	
Measurement of Lineup	)	
System	)	

MOTION FOR ACCEPTANCE  
OF LATE-FILED  
REPLY COMMENTS OF  
NATIONAL BROADCASTING COMPANY, INC.

National Broadcasting Company, Inc. (NBC) hereby seeks leave to file the attached reply comments in the above-referenced proceeding out of time.

One of the two original parties in this proceeding, Airtrax, has referred to a suggestion made in NBC's initial comments in Airtrax's Reply Comments. The other original party, A.C. Nielsen Company, also has referred to this same suggestion in an October 18, 1989, letter to the Chief of the Mass Media Bureau. NBC believes that it will add to the record in this proceeding if the Commission includes NBC's own brief additional comments on its suggestion in the record.

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For this reason, leave is sought to file the attached  
Reply Comments out of time.

Respectfully submitted,

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Molly Pauker  
Washington Counsel  
National Broadcasting Company, Inc.  
1331 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

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Measurement of Lineup                )  
System                                 )

REPLY COMMENTS  
OF  
NATIONAL BROADCASTING COMPANY, INC.

National Broadcasting Company, Inc. (NBC) files the following reply comments in response to the Reply Comments of Airtrax and a letter to the Chief of the Mass Media Bureau filed by counsel for A.C. Nielsen Company (Nielsen) on October 18, 1989 and refiled in corrected form on October 19, 1989.

Both of these parties referred to a suggestion made in NBC's initial comments to the effect that there may be other, relatively inexpensive technical means of solving the only problem raised by Nielsen in justification of its

desire to use line 22 for AMOL service in the case of syndicated programming. We suggested that stations whose equipment automatically strips the VBI could use a converter box that would transfer Nielsen's line 20 information to line 22 of the videotape of the program as it is recorded and then transfer the AMOL information back to line 20 on playback for broadcast.

As an initial matter, we wish to state that this particular suggestion was not intended to posit an ideal solution to the controversy between Airtrax and Nielsen, but merely to suggest that there may be other simple technical alternatives that these parties might wish to explore. Indeed, it is our impression, based on many years of experience using Nielsen's AMOL system, that the overwhelming majority of line 20 stripping problems are logistical, as opposed to technical. That is, most, if not all, broadcasters' present equipment can be simply adjusted and the stripping problem eliminated. Additionally, the possibility of time sharing on line 22 ought not to be ruled out. NBC takes no position on whether any of these alternatives are preferable or even feasible.

With respect to the specific suggestion made in NBC's comments, we wish to make the following clarification. Contrary to the views expressed by Nielsen in its October

18 letter, there is precedent for the conversion equipment envisioned by NBC. The device envisioned for this procedure would examine a designated input line of the video signal to extract the appropriate data. This data would then be stored in (computer) memory until the occurrence of a designated output line. Then the data would be encoded into appropriate form on that output line. With suitable choice of input and output lines, the device could be used to transfer ratings data both from line 20 to line 22 and subsequently from line 22 back to line 20. An added advantage to this procedure is that the data signal would be regenerated on each transfer, thereby making it less affected by distortions further on in its delivery.

A similar procedure is used within the "video data bridge" associated with the delivery of teletext. It is likely that manufacturers of those data bridges could supply a suitable device at a cost of approximately \$5,000. The teletext data bridge is in fact about the size of a bread box (5½" X 20" X 19"), and it is reasonable to assume that the suggested conversion equipment need be no larger.

We readily grant that this suggestion may not solve all of the issues between these parties. While the hardware may be relatively inexpensive, implementation may be manpower intensive. Moreover, the above-described

procedure would result in a line 22 void of program material on broadcast, which maybe problematic. Finally, we would not support the storage of encoded data in any active picture lines other than line 22, such as line 23, proposed by Airtrax in its Reply Comments at pages 8 - 11. As our initial comments stated, it may be unrealistic to continue to count on the amount of overscan in the existing receiver population continuing into the future. Similar views were expressed in NAB's Comments and CBS' Reply Comments. As overscan is necessary to obscure nonprogram information in active picture lines, the Commission ought not to authorize additional lines without thoroughly exploring this issue.

Respectfully submitted,

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Molly Pauker  
Washington Counsel  
National Broadcasting Company, Inc.  
1331 Pennsylvania Avenue, N.W.  
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November 2, 1989

CERTIFICATE OF SERVICE

I, Linda Givens, hereby certify that on this 2nd day of November, 1989, I have mailed, first-class, postage prepaid copies of the foregoing COMMENTS OF NATIONAL BROADCASTING COMPANY, INC., to the following:

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